

ANTI-MONEY LAUNDERING (AML) POLICY

BEETELLER GROUP

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1. DEFINITIONS

Words and expressions indicated by the first or all capital letters shall have the definitions below, without prejudice to other definitions indicated in this Policy:

- **ADMINISTRATORS:** partners, managers and directors of **BEETELLERPAY INSTITUIÇÃO DE PAGAMENTO LTDA.** and **BEETELLER REAL TOKEN LTDA.**, belonging to **BEETELLER GROUP.**
 - **COMPLIANCE AREA:** specific area of GRUPO BEETELLER responsible for ensuring that all internal procedures and the Applicable Legislation are complied with, establishing a program compatible with GRUPO BEETELLER's nature, structure, risk profile and business model, so as to ensure the management of risks related to Money Laundering and Terrorism Financing.
 - **PAYMENT ARRANGEMENT:** set of rules and procedures that disciplines the provision of a certain payment service to the public by Law No. 12,865/2013.
 - **BACEN:** Central Bank of Brazil.
 - **REPORTING CHANNEL:** communication channels made available by GRUPO BEETELLER to receive reports of activities that may be characterized as Money Laundering or Terrorism Financing.
 - **CARD:** physical or electronic instruments with payment functions made available by the Issuers in the form of a plastic card or other physical or digital means, for the personal and non-transferable use of the Bearers, accepted in the BEETELLER GROUP's Systems to carry out Transactions.
 - **"VIRTUAL CARD":** virtual, non-physical payment instrument issued by a Payment Institution, by which the User may make payments to BEETELLER GROUP.
 - **CLIENTS:** those who, as a User, contract and use products and/or services of BEETELLER GROUP.
 - **COLLABORATORS:** employees, non-employee service providers, trainees and interns of BEETELLER GROUP.
 - **COAF:** Council for Financial Activities Control, which acts to prevent and combat Money Laundering and Terrorist Financing, or a body that succeeds it with the same purpose.
 - **TERRORIST FINANCING:** **FINANCIAL** support, by any means, for terrorism or those who encourage, plan, or commit acts of terrorism.
 - **SUPPLIERS:** any individual or legal entity, public or private, national or foreign, as well as unidentified entities, which develop commercialization activities for products or services rendered to BEETELLER GROUP.
 - **PAYMENT INSTITUTION:** for the purposes of this Policy, is the electronic money issuer, whose activity consists in managing the users' payment account, used for the payment of prepaid transactions.
 - **KNOW YOUR CUSTOMER (KYC):** it is the process by which BEETELLER GROUP obtains information from the Customers, who may be indicated by the Business Partners, in order to, through previous diligence, check their
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- reputation, suitability and truthfulness of the registration data informed; seeking to avoid the practice of Money Laundering and Terrorist Financing.
- **KNOW YOUR PARTNER (KYP):** it is the process by which BEETELLER GROUP obtains information from its Business Partners and Suppliers, in order to, through previous diligence, check their reputation, suitability and truthfulness of the registration data informed; seeking to avoid the practice of Money Laundering and Terrorism Financing.
 - **KNOW YOUR EMPLOYEE (KYE):** it is the process by which BEETELLER GROUP obtains information from its employees, in order to check their reputation, suitability and truthfulness of the informed registration data, seeking to avoid the practice of Money Laundering and Terrorism Financing.
 - **MONEY LAUNDERING:** illicit act with the objective of hiding or disguising the nature, origin, location, disposition, movement or property of goods, rights or values derived directly or indirectly from a criminal infraction.
 - **OFAC:** *Office of Foreign Assets Controls*, which is the agency of the U.S. Department of the Treasury that administers and applies economic and trade sanctions against foreign countries and regimes considered to be terrorists, international drug traffickers, involved in activities related to the proliferation of weapons of mass destruction, and other threats to that country's national security, foreign policy, or economy.
 - **INTERNATIONAL PAYMENTS:** services provided by BEETELLER GROUP, as an eFX, to make payment orders to the User or Foreign Seller.
 - **BUSINESS PARTNERS:** any individual or legal entity, public or private, national or foreign, that enters into contracts with BEETELLER GROUP, with the purpose of, in exchange for payment, collaborating with BEETELLER GROUP's business.
 - **PEP:** Politically Exposed Person, which consists of a public agent who holds or has held, in the previous 05 (five) years, in Brazil or in foreign countries, territories and dependencies, relevant public positions, jobs or functions, as well as their representatives, family members and close associates, all as defined in articles 19 and 27 of Circular nº 3.978/2020.
 - **POLICY:** this Policy on Prevention of Money Laundering and Terrorist Financing - PLDFT.
 - **Cardholder:** an individual or an agent of a legal entity who holds a Card issued by the Issuers, and who may perform Transactions through BEETELLER GROUP's System.
 - **TRANSACTIONS:** for the purposes of this Policy, they consist of the movements made by the Client from his or her payment account, by means of the contribution, transfer, or redemption of financial resources, by any means.
 - **USER:** an individual or legal entity, holder of a Payment Account, who, by adhering to the Payment Account opening term, is qualified to make Transactions through the Payment System.
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- **FOREIGN SELLER:** the legal or natural person, located abroad, responsible for the commercialization of Products through the Platform, which will be the final recipient of the resources submitted to the Shipment Order by the User or original sender of the Entry Order (as applicable), and the Payment Orders may be sent or received by the Foreign Seller directly or through a representative.

2. APPLICABLE STANDARDS

All those to whom this Policy is applicable shall comply with the laws and regulations set forth below (together "Applicable Laws"):

- **LAW No. 9.613/1998:** provides on Money Laundering crimes and on the prevention of the use of the financial system for the illicit acts foreseen in this law.
- **LAW No. 12,865/2013:** provides for Payment Arrangements and Payment Institutions that are members of the Brazilian Payment System (SPB).
- **LAW No. 13,260/2016:** disciplines the Financing of Terrorism.
- **BCB Resolution N° 44/2020:** establishes procedures for implementing the measures determined by Law N° 13,810/2019.
- **BCB RESOLUTION N° 96/2021:** provides for the payment account used by Payment Institutions to record Transactions.
- **RESOLUTION BCB N° 80/2021:** establishes the requirements and procedures for the constitution and operation, and for the application for authorization to operate of Payment Institutions, and provides for the rendering of payment services by other institutions authorized to operate by the Bacen.
- **COAF RESOLUTION No. 40/2021:** provides for the procedures to be observed by the persons regulated by COAF, as per paragraph 1 of Article 14 of Law No. 9.613, of March 3, 1998, regarding politically exposed persons.
- **CIRCULAR BCB No. 3,691/2013 (amended by Resolution BCB No. 137/21):** provides for the foreign exchange market.
- **BCB CIRCULAR 3,978/2020:** provides for the policy, procedures, and internal controls to be adopted by institutions authorized to operate by the Bacen, with a view to preventing the use of the financial system to commit the crimes of Money Laundering and Terrorist Financing.
- **CIRCULAR LETTER BCB NO. 4,001/2020:** discloses the list of operations and situations that may be indicative of Money Laundering and Terrorist Financing crimes, susceptible of communication to COAF.
- **BCB Normative Instruction N° 262/2022:** specifies and clarifies operational aspects of the procedures established in BCB Resolution N° 44/2020, for the execution of measures determined by Law N° 13,810/2019, which provides for compliance with sanctions imposed by United Nations Security Council resolutions.

The laws and norms are cited as examples and do not exhaust all the Applicable

Legislation to GRUPO BEETELLER's activities. The *Compliance* Area will be responsible for checking for possible updates, revocation and edition of new rules. GRUPO BEETELLER operates as a Payment Arrangements Institution and Payment Institution, and does not need authorization to operate from Bacen, under the terms of BCB Resolution 105/2021 and BCB Normative Instruction 210/2021.

BEETELLER GROUP, acts as an eFXEFX under the terms of Bacen Circular 3,691/2013.

GRUPO BEETELLER will amend this Policy in compliance with all the monitoring and selection procedures set forth in Bacen Circular 3,978/2020, as well as in case it requests authorization to operate from Bacen for the Payment Arrangements Institution and Payment Institution types.

For better understanding of the Applicable Law by all persons covered by this Policy, BEETELLER GROUP clarifies:

The crime of Money Laundering aims to disguise the nature, origin, location, movement or ownership of goods (money, assets, real estate, furniture, among others) obtained through illicit acts. Through money laundering, the goods or resources of "dirty" or illegal origin return to the formal economy with the appearance of "clean" or legal, which makes it difficult to punish the agent for the criminal practice.

There are three phases that characterize Money Laundering: Placement, Concealment, and Integration:

- **PLACEMENT:** aims to insert the illicit goods or resources in the formal economy, that is, in licit companies or businesses. This phase consists of the introduction of the illicit goods or resources into the financial system, making it difficult to identify their origin.
- **CONCEALMENT:** adoption of measures that aim to hinder the tracking of illicit assets or resources. In this phase there is an attempt to camouflage the evidence and the connection between the asset and the crime committed. Several financial transactions can be performed in order to add complexity and make future tracking more difficult.
- **INTEGRATION:** after being hidden and "laundered", in different financial operations, the goods or resources return to the agents through the simulation of apparently licit businesses.

Money Laundering is classified as a crime in Law No. 9.613/1998 and is punishable by imprisonment from 3 to 10 years, fine and other penalties. It is not necessary to have all three phases of the offense, because each phase alone is already considered Money Laundering.

Terrorist Financing relates to the covert distribution of goods or resources for use in acts and/or by terrorist organizations, as well as the financing of proliferation of weapons of mass destruction. The methods used are generally similar to those employed in Money Laundering.

3. POLICY OBJECTIVE

GRUPO BEETELLER, through this Policy, establishes its procedures to be followed by its Directors, Employees, Suppliers, Clients, Business Partners, as follows:

GRUPO BEETELLER is a Payment Arrangement Institutor and Payment Institution that issues electronic currency, pursuant to Law 12,865/13 and BCB Resolution 105/2021 and BCB Normative Instruction 210/2021.

Among the services offered, BEETELLER GROUP performs the management and custody of Customers' financial resources, which may be indicated by Business Partners, enabling the receipt and execution of payments through Transactions.

It is part of GRUPO BEETELLER's business to act as an EFX, under the terms of BCB Circular 3,691/2013, that is, to perform the international transfer service, by means of an exchange operation or by means of an international transfer in reais. Among the services offered, BEETELLER GROUP intermediates payments abroad, and may execute: (i) remittance of funds from the User to the Foreign Vendors, with the sole purpose of paying for International Purchases; and (ii) inflow of funds for payment to the User of amounts owed by the Foreign Vendors. For the EFX operation, BEETELLER GROUP will use an institution authorized by Bacen to operate in the foreign exchange market and make international transfers of resources, to make the Payment Order.

Thus, Clients and Business Partners may not attempt to use the services provided by BEETELLER GROUP to commit crimes related to Money Laundering and Terrorism Financing, by hiding or concealing the nature, origin, location and movement of resources from criminal offenses, with the purpose of incorporating them into the financial system.

Therefore, this Policy aims to define the guidelines by which the prevention of Money Laundering and Terrorism Financing is based due to the activities of BEETELLER GROUP, as a Payment Arrangement Institution and Payment Institution.

Through its *Compliance* Area, GRUPO BEETELLER will adopt internal rules, standards, procedures, training, corporate communication and preventive, corrective and punitive measures in order to make GRUPO BEETELLER, in all areas, adhere to this Policy.

Furthermore, GRUPO BEETELLER provides a Reporting Channel, which will carry out the appropriate treatment of the occurrences forwarded by the e-mail compliance@beeteller.com through: receipt, preliminary analysis, classification, treatment, monitoring, investigation, decision making, reporting of occurrences and closure of occurrences.

GRUPO BEETELLER will receive and act on reports from Directors, Employees, Suppliers, Customers, Business Partners or any third parties, about atypical or suspicious activities that may be characterized as indications of crimes related to Money Laundering and Terrorism Financing

The complaints will be received by a trained professional with the necessary autonomy, being guaranteed the anonymity and secrecy of communications, as

well as the preservation of the integrity of the complainant.

4. POLICY SCOPE

This Policy covers all areas of BEETELLER GROUP, its Administrators, Customers, Employees, Suppliers and Business Partners, which shall agree, adhere and be bound to comply with what is established herein.

Through the *Compliance Area*, everyone will be informed and trained to identify possible Money Laundering and Terrorist Financing crimes, as well as to report suspected illicit activities to the Reporting Channel.

5. ATTRIBUTIONS OF THE COMPLIANCE AREA

The *Compliance Area* will be responsible for ensuring that all of BEETELLER GROUP's internal procedures are followed.

It is the *Compliance Area* that must promote the organizational culture of prevention of Money Laundering and Terrorism Financing, including Administrators, Customers, Employees, Suppliers and Business Partners.

Through the *Compliance Area*, GRUPO BEETELLER will assign specific obligations and actions to the other business areas, in particular:

- **COMMERCIAL:** observe KYC and KYP processes for Customers and Business Partners.
- **PROCUREMENT:** observe the KYP process with respect to Suppliers, by registering and verifying the information provided after the *Request for Proposal* ("RFP"), *Request for Information* ("RFI") or *Request for Quotation* ("RFQ"), or other procurement processes as applicable.
- **CONTROLLERSHIP:** TO maintain the good performance of GRUPO BEETELLER's activities, creating methodologies and systems that develop managerial controls, working together with the Compliance area to optimize processes and mitigate risks and signs of money laundering and terrorism financing crimes.
- **FINANCIAL:** TO establish the procedures concerning the treasury functions, control of accounts payable and receivable, management of third-party resources, accounting, planning, tax management, and risk control of possible indications of fraud.
- **LEGAL:** to establish and ensure compliance, among other activities, with this Policy and the requirements of the Applicable Legislation.
- **MARKETING:** observe the KYP process with respect to Suppliers, through registration and verification of information provided by the RFP, RFI or RFQ, or other registration processes and verification of information provided as applicable. As well as the KYE process with respect to Employees in the functions of marketing actions and campaigns, gifts, awards, etc., as applicable.
- **OPERATIONS:** observe KYC and KYP processes for Customers, Suppliers and Business Partners, with respect to operational, logistical, accreditation, account opening and Customer qualification processes.

- **HUMAN RESOURCES:** to establish KYE criteria and processes for the selection and hiring of Employees that have a profile consistent with this Policy, and in observance of the degree of responsibility of each Employee regarding the fulfillment of the responsibilities assigned to him/her in the procedure of analysis, registration, monitoring and reporting of suspicious activities.
- **IT:** TO act with diligence in the authorization of access to the systems, information security, data protection and secrecy, and to maintain the technological tools to be used, in order to restrain actions that have the objective of fomenting the practice of Money Laundering and Terrorism Financing.

Each of the areas of GRUPO BEETELLER shall, through their respective Employees, inform the *Compliance Area* about suspicious activities related to Money Laundering and Terrorism Financing.

The *Compliance Area* will be responsible for: (i) create and manage the control mechanisms aimed at preventing Money Laundering and Terrorism Financing; (ii) create and coordinate the communication and training of Directors and Collaborators; (iii) ensure compliance with the performance mechanisms of the Denouncement Channel; (iv) monitoring occurrences of atypical or suspicious transactions identified by BEETELLER GROUP's technological tools or that are reported by Employees; (v) framing and monitoring PEP, when necessary; (vi) analyzing Clients, Suppliers and final beneficiary involved in sanctioning lists; and (vii) communicating with COAF and Bacen.

Furthermore, the *Compliance Area* must ensure the broad dissemination of this Policy to Suppliers and Business Partners, as well as ensure that its conditions are provided for in the contracts with Customers.

The *Compliance Area* is also responsible for analyzing new products and services of GRUPO BEETELLER, in order to identify vulnerabilities to the need to prevent Money Laundering and Terrorism Financing.

6. KNOW YOUR CUSTOMER (KYC), KNOW YOUR PARTNER AND SUPPLIER (KYP) AND KNOW YOUR EMPLOYEE (KYE)

The KYC and KYP procedures are intended to prevent BEETELLER GROUP's activities from being used in any way to commit any of the crimes listed in this Policy. Furthermore, this process aims at maintaining the integrity and image of BEETELLER GROUP before its Managers, Clients, Employees, Suppliers, Business Partners and also before the society.

The data informed in the KYC and KYP procedures will be confirmed through the sending of documents and/or by consulting public or private databases, such as credit and risk analysis bureaus, as well as internal databases or databases shared by other companies.

There will be the storage of information obtained in the KYC and KYP procedures, which must be compatible with the risk profile defined by the *Compliance Area*, according to the nature of the business and the risk to which BEETELLER GROUP will be exposed.

The registration information will be archived for a minimum period of 5 (five) years, starting from the first day of the following year after the end of the relationship with the Customer, Supplier or Business Partner.

Tests must be run every 12 months to validate the registration information. Eventual inconsistencies will be dealt with in a timely manner, aiming at their regularization.

A. KNOW YOUR CUSTOMER (KYC)

The KYC process, aims to implement procedures to know the respective clients, with the adoption of prior and periodic diligence that ensures their identification, qualification and classification, preventing the occurrence of Money Laundering and Terrorism Financing, aims to implement procedures to know the respective clients, with the adoption of prior and periodic diligence that ensures their identification, qualification and classification, preventing the occurrence of Money Laundering and Terrorism Financing.

BEETELLER GROUP shall only accept potential Clients that perform lawful activities and are not contrary to the Applicable Law.

When registering Clients, BEETELLER GROUP must always observe the following procedures:

- a. Customer registration will be carried out in an individualized and standardized way, containing all the personal data and information required by the Legislation in force;
- b. Consultation will be carried out on the veracity, suitability, and timeliness of the information;
- c. There will be consultation of available information on specialized sites on prevention of Money Laundering and Terrorist Financing;
- d. Clients who are business or professional will be classified according to their line of business, and there will be consultation with public or private sources to validate the information;
- e. The Client will be classified according to its activity, registration information, and asset situation;
- f. There will be specific classification for Customers considered as WBS;
- g. There will be no approval of the registration of potential Clients included in OFAC's list;
- h. At any time, including after registration, additional information, declarations, and documents may be requested to validate the information;
- i. Client information will be updated periodically, for a period not longer than twelve (12) months.

Each Client will be classified according to a specific risk profile, to enable the control and monitoring of the Transactions, as follows: (i) natural person; (ii) legal entity; (iii) simplified registration; (iv) complete registration; (v) business or professional activity performed; (vi) PEP; and (vii) member of the OFAC list.

After the risk classification, the Client may: (i) have his registration request denied; (ii) suffer restrictive measures, through the unavailability of certain services or the

limitation of the value of Transactions; (iii) have the Monitoring Strengthened (as defined below), or (iv) have the relationship blocked or terminated. The internal rules of the *Compliance Area* will detail which restrictions will apply.

BEETELLER GROUP will establish risk mitigation criteria for accrediting Clients who do not prove they have a business or professional activity, by setting a maximum limit for Transactions in certain periods, in accordance with the criteria defined by the *Compliance Area*, according to the Legislation in force.

If the Customer develops a business or professional activity in a physical establishment, BEETELLER GROUP or a Business Partner (if applicable) may, physically or remotely (including by using geolocation technologies), verify the effective existence of the establishment in the indicated location.

B. GET TO KNOW YOUR PARTNER (KYP)

The KYP process aims to implement procedures to know the Suppliers and Business Partners, with the adoption of prior and periodic diligence that ensures their identification, qualification and classification, preventing the occurrence of Money Laundering and Terrorism Financing.

When registering Suppliers and Business Partners, BEETELLER GROUP must always observe the following procedures:

- a. Perform the registration in an individualized and standardized way, containing all the information required in the RFP, RFI or RFQ process, or other contracting processes defined by BEETELLER GROUP;
- b. Perform consultation on the veracity, suitability, and timeliness of the information;
- c. Consult the information available on websites specialized in preventing Money Laundering and Terrorist Financing;
- d. Perform the analysis of the credit and debt situation;
- e. Conduct media research to verify the existence of negative news related to Money Laundering or Terrorist Financing;
- f. At any time, including after registration, request the submission of additional information, declarations, and documents to validate the information.

The Supplier or Business Partner may be classified according to their business or professional activity, if a risk profile associated with their activity is identified, in accordance with the internal rules of the *Compliance Area*.

The following procedures will be observed with respect to Partners, Administrators, Directors and/or representatives of Suppliers and Business Partners: (i) consultation on the PEP list and OFAC list; (ii) verification of identification documentation; and (iii) other procedures set forth in the previous item, as applicable.

As a result of the KYP process, you may be refused employment with any Supplier or Business Partner.

If the business or professional activity carried out by the Supplier or Business Partner is classified as high risk, there will be Enhanced Monitoring on the

amounts received.

The remuneration to be paid by BEETELLER GROUP, regardless of its nature, shall be settled in a payment account or bank account owned by the respective Supplier or Business Partner.

The contracts to be entered into with Suppliers and Business Partners must necessarily contain specific obligations related to the prevention of Money Laundering and Terrorist Financing.

C. GET TO KNOW YOUR EMPLOYEE (KYE)

The selection and hiring of Collaborators, including outsourced staff, will be carried out with the objective of reducing the risk of illicit practices of any nature, including the prevention of Money Laundering and Terrorist Financing, regardless of the position or function.

The managers of the respective areas of BEETELLER GROUP are responsible for identifying and reporting to the *Compliance* Area any behavior contrary to what is established in this Policy, or to other policies and procedures adopted by BEETELLER GROUP 's Human Resources area.

BEETELLER GROUP, through its Human Resources area, establishes criteria and processes to select and hire employees who have a profile in line with this Policy, aiming at the fulfillment of the responsibilities assigned to them when performing their activities.

Collaborators shall be monitored pursuant to Law 9.613/98, especially articles 9, 10 and 11. There must be equal treatment in this conduct, including all Collaborators, and monitoring for discriminatory purposes is forbidden. BEETELLER GROUP shall notify the Collaborator of such monitoring in advance, by delivering this Policy or expressly mentioning it in his/her work contract.

7. POLITICALLY EXPOSED PERSONS (PEP)

The *Compliance* Area will indicate the procedures that must be adopted in order to qualify Customers, Suppliers and Business Partners (as well as their Partners, Administrators, Directors and/or Representatives) as PEP.

The qualification of Clients, Suppliers, and Business Partners will be carried out by consulting the public and private lists available, or by means of a self-declaration that will appear in the record of each one of them.

The approval of the registration of the Customer, Supplier or Business Partner classified as PEP must be reported to the *Compliance* Area, which will be responsible, with exclusivity, for approving or not the registration.

If approved, the respective areas must report to the *Compliance* Area all the Transactions carried out by the WBS Clients.

8. PROCEDURE FOR RECORDING TRANSACTIONS

Each area of BEETELLER GROUP, according to its attributions, will be responsible, together with the *Compliance* Area, for developing the processes to keep the records of the Transactions performed by the Clients.

The registrations must be made according to the following modalities, where

applicable:

- a. Transactions of contribution, transfer or redemption of resources;
- b. Transactions made by the Client himself or to/from third parties, considering the Client's CPF or CNPJ registration;
- c. Modality of Transactions, such as, as applicable, bank draft, prepaid card, postpaid card, virtual card, financial system transfer, international transfers, transfer by other payment arrangements, or by cash withdrawal;
- d. Transaction Completion Date;
- e. The amount and currency of each transaction;
- f. With respect to the EFX Customer in Brazil, the CPF or CNPJ, the name and, in case of acquisition of goods or services abroad, the form of payment used; and
- g. For the buyer or seller abroad, EFX, its name and country.

The Transaction register will also identify the necessary information about the origin, the destination, and the final beneficiary of the resources.

For the monitoring of the Transactions, the *Compliance* Area must stipulate, in addition to the records mentioned above, the value of the Transactions and the monitoring and selection criteria that allow the identification of suspicious Transactions.

BEETELLER GROUP shall keep records of all the operations carried out by the Clients, which shall be filed for a minimum period of 5 (five) years, counted as of the first day of the year following the conclusion of the operation and, in the case of information and records of funds transfer, the term shall be 10 (ten) years.

9. MONITORING AND ANALYSIS OF OPERATIONS AND SUSPICIOUS SITUATIONS

The *Compliance* Area will be responsible for monitoring and screening procedures that allow the identification of Transactions and situations that may indicate suspicion of Money Laundering and Terrorist Financing.

Technological monitoring tools with automatic alerts for atypical activities must be used to monitor transactions.

Transactions in which, according to the monitoring procedures instituted by the *Compliance* Area, there are indications of Money Laundering or Terrorist Financing may be automatically disapproved and cancelled, due to

- a. Habituality, value, periodicity, form or history of the Customer with respect to previous Transactions;
 - b. Intent to generate gain, without any substantiated economic benefit;
 - c. Omission or unjustified delay in sending information and/or documents by the Client;
 - d. Significant oscillation in relation to the volume and/or frequency of Transactions;
 - e. Sudden and unjustified change in the modality or value of the Transaction;
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- f. Incompatibility with the Client's financial capacity, given its income, billing, or assets;
- g. Continuous repetition of Transactions between the Client and the same beneficiary;
- h. Compensation of credits and debits between the Client and the same beneficiary;
- i. Client acting on behalf of a third party;
- j. Suspicion that the beneficiary, through an intermediary, is the Client himself;
- k. Difficulty or impossibility to identify the final beneficiary;
- l. Findings of erroneous, untrue or outdated information from the Client; and
- m. Denunciations received by the Denunciations Channel.

The *Compliance* Area of BEETELLER GROUP, according to the criteria set forth in this Policy, shall create a procedure for monitoring specific Clients or Transactions ("Enhanced Monitoring").

Enhanced Monitoring will occur when a Transaction is made: (i) by a Client that is considered a PEP; (ii) at an amount that exceeds the established limit; (iii) by a legal entity Client that, due to its activity, is classified as high risk; (iv) for the same amount, repeatedly, on the same day; (v) for transaction amounts that are discrepant from the Client's daily behavior (time, amount, transaction capture mode, etc.) or (vi) for a sales increase in the amount of 50% (fifty percent) higher than the total volume of Transactions made in the previous month, in an inexplicable manner or without the consolidation of the transaction.) or (vi) by increment of sales in the amount 50% (fifty percent) higher than the total volume of Transactions made in the previous month, in an inexplicable way or without having consolidated the Client's operation.

The Transactions subject to Enhanced Monitoring must be manually approved by the responsible area. If an irregularity is suspected, the employee in the area: (i) must not approve the Transaction; and (ii) must contact the Client to request additional information and documents.

For Transactions above the established limit, the Client must complete his registration information and send the necessary documents.

For the analysis of the lawfulness of the Transaction, documents proving its regularity and lawfulness must be requested, being admitted, cumulatively: (i) contracts for the purchase and sale of the goods or provision of services; (ii) invoice; and (iii) proof of delivery of the goods or services.

The documents must be forwarded to the *Compliance* Area for analysis, which will be responsible for approving or not the Transaction.

During the analysis procedure, the *Compliance* Area must adopt the following procedures:

- a. The Client's access to BEETELLER GROUP's electronic platform is blocked and the services are suspended;
 - b. Withholding of the amounts until the legality of the Transaction is ascertained;
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- c. Guidance for the termination of the contract with the Client, in case the Transaction is not approved.

If the Transaction is not approved due to evidence of suspected fraud, the funds must be returned to the sender, in a bank account of the same ownership, and upon signature of a receipt or statement by the recipient, giving full discharge of the refund.

The atypical transaction must always be reported to the *Compliance Area* by the Collaborators, even if there is contact with the Client and sending of documents and information.

10. COMMUNICATION PROCEDURE TO COAF

BEETELLER GROUP, through the *Compliance Area*, is responsible for communicating to COAF the Transactions considered suspicious, under the terms of this Policy, through: (i) the Financial Activities Control System (SISCOAF) or (ii) the System for Registration of Denunciations, Complaints and Information Requests (RDR).

The procedures will be adopted depending on the BEETELLER GROUP's regulatory framework.

According to the Applicable Law, BEETELLER GROUP shall refrain from providing Clients with information on any communications made due to evidence of Money Laundering or Terrorism Financing crimes.

The communication to COAF shall be made within the legal period. In case there is no communication in a given year, BEETELLER GROUP shall provide a negative statement, according to the Applicable Law.

The *Compliance Area* will meet any demand, request, or request for clarification from COAF and Bacen.

11. COMMUNICATION AND TRAINING

The *Compliance Area* is responsible for the communication and training of BEETELLER GROUP's Managers and Employees, which, together with the Human Resources and Marketing areas, shall prepare all the appropriate documentation for communication, training and proof of awareness and participation of those involved.

The training will be conducted: (i) whenever there is the admission of new Directors and Employees; (ii) periodically, within a period not exceeding 01 (one) year, or (iii) if there is any change to this Policy or the internal procedures adopted by the *Compliance Area*, or in detriment to the Legislation in force.

The training will be carried out by those responsible for the *Compliance Area*, either in person or remotely, and may be assisted by external advisors.

Furthermore, the *Compliance Area* must communicate the procedures set forth in this Policy to Suppliers and Business Partners.

The purpose of this Policy is to disseminate standards of integrity and ethical conduct as part of BEETELLER GROUP's culture, and to ensure full compliance with legal duties.

12. GENERAL PROVISIONS

Senior Management is responsible for reviewing, changing and updating this Policy whenever necessary.

This Policy shall be approved by BEETELLER GROUP's Senior Management, according to its internal attributions.

The *Compliance Area*, as applicable, will maintain documents, minutes, reports, risk assessments and manuals related to the prevention of Money Laundering and Prevention of Terrorism.

This Policy is effective as of the date of its publication and will be in effect for an indefinite period, to be revised whenever necessary.

This Policy is accompanied by an Agreement to Join the PLDFT, and an Agreement to Join the Amendments to this PLDFT.

Author	Barcellos & Tucunduva Advogados
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ANNEX 1**TERM OF ADHESION TO PLDFT**

I, _____, enrolled in the CPF under no. _____, declare that I am aware of this Money Laundering and Terrorism Financing Prevention Policy, as well as of the guidelines contained in the other policies, rules and internal procedures of BEETELLER GROUP.

I am aware of BEETELLER GROUP's activities and how they can be used to commit Money Laundering and Terrorism Financing crimes. Therefore, within my function obligations, I shall, whenever necessary, use the Reporting Channel to report any type of suspicious activity and/or treated as criminal by this Policy and by BEETELLER GROUP.

_____/_____/_____

Date

Signature

ANNEX 2**TERM OF ADHESION TO THE AMENDMENTS OF THIS PLDFT**

I, _____, enrolled in the CPF under no. _____, declare that I am aware of the changes made in this Prevention of Money Laundering and Terrorism Financing Policy, as well as of the guidelines contained in the other policies, rules and internal procedures of BEETELLER GROUP.

I am aware of BEETELLER GROUP's activities and how they can be used to commit Money Laundering and Terrorism Financing crimes. Therefore, within my function obligations, I shall, whenever necessary, use the Reporting Channel to report any type of suspicious activity and/or treated as criminal by this Policy and by BEETELLER GROUP.

_____/_____/_____

Date

Signature
